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Attorney for Defendant Pina-Flores

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HON. MARILYN L. HUFF)

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE PINA FLORES,

Defendant.

Case No. 08CR 1556-H

Date: July 7, 2008

Time: 2:00 P.M.

NOTICE OF MOTIONS AND
MOTIONS TO:

1) COMPEL DISCOVERY;

2) NOTICE OF 404(B);

3) ALLOW ATTORNEY
CONDUCTED *VOIR*

DIRE; AND

4) LEAVE TO FILE FURTHER
MOTIONS

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND
LUELLE CALDITO, ASSISTANT UNITED STATES ATTORNEYS:

PLEASE TAKE NOTICE that on Monday, July 7, 2008, at 2:00 p.m., or as soon
thereafter as counsel may be heard, the defendant Jose Pina- Flores, by and through his attorney
Barbara M. Donovan, will ask this Court to issue an order granting the motions listed below.

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MOTIONS

The defendant, Jose Pina- Flores, by and through his attorney, Barbara M. Donovan, asks this Court pursuant to the Fourth, Fifth, and Sixth Amendments to the United States Constitution, Federal Rules of Criminal Procedure 12, 16, 26.2, and all other applicable statutes and local rules for an order to:

1. Compel discovery; 2. Notice of 404(b); 3. Allow attorney conducted *voir dire*; 4. Leave to file further motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Dated: June 23, 2008

Respectfully submitted,

S/ Barbara M. Donovan

BARBARA M. DONOVAN
Attorney for Defendant Pina-Flores

DONOVAN & DONOVAN
Barbara M. Donovan
Attorney at Law
The Senator Building
105 West F. Street - 4th floor
San Diego, CA 92101

U.S.D.C. No.08-CR-1556-H

DECLARATION OF SERVICE

I, undersigned, say: I am over 18 years of age, employed in the County of San Diego, California, in which county the within mentioned delivery occurred, and not a party to the subject cause. My business address is 105 West F. Street, San Diego, California. I served the Defendant's Notice of Motion, Motion and Memorandum of Points and Authorities, of which a true and correct copy of the documents filed in this cause is affixed, by electronic filing to:

Luella Caldito, Assistant U.S. Attorney
Office of the United States Attorney
880 Front Street, Room 6293
San Diego, CA 92188

The electronic filing was done by me at San Diego, California, on June 23, 2008.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 23, 2008 at San Diego, California.

s/ Barbara M. Donovan

Barbara M. Donovan